

TRINA A. HIGGINS, United States Attorney (7349)
CARL D. LESUEUR, Assistant United States Attorney (16087)
TRAVIS K. ELDER, Assistant United States Attorney (11987)
Attorneys for the United States of America
111 South Main Street, Suite 1800, Salt Lake City, Utah 84111
(801) 524-5682 | travis.elder@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AARON WAGNER, et al.,

Defendants.

BILL OF PARTICULARS
FOR FORFEITURE

Case No. 2:24-cr-00357-TS

Senior Judge Ted Stewart

On November 6, 2024, the United States filed Indictment that gave notice of the government's intent to forfeit property under 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(2)(A) and 18 U.S.C. § 982(a)(1). ECF 1. This forfeiture notice indicated that the following property was sought for forfeiture:

- A real estate property at 500 South Higgins Avenue in Missoula, Montana;
- A real estate property at 781 North Country Manor Lane, Alpine, Utah;
- Proceeds of the sale of a real estate property at 7323 East Shoeman Lane, Scottsdale Lane, Scottsdale, Arizona;
- A Cirrus SR 22 aircraft with serial number 133 and tail number N1052A;

The United States now gives notice that it is also seeking to forfeit the following additional property pursuant to the same forfeiture authorities listed in the Indictment's forfeiture notice:

- Proceeds of the sale of real estate property at 856 West Antelope Drive, Clearfield, Utah;
- \$64,170.00 in proceeds from the sale of the Crumbl Cookie Franchise owed to Mantel Capital, LLC;
- \$50,889.60 in proceeds from the sale of a Crumbl Cookie Franchise owed to Dynamic Capital, LLC;
- \$129,116.69 in proceeds from the sale of a Crumbl Cookie Franchise owed to WagsCap Food Services, LLC "Beaverton, OR";
- \$147,297.86 in proceeds from the sale of a Crumbl Cookie Franchise owed to WagsCap Food Services, LLC "Southlake, TX"; and
- A real estate property at 898 W. Sapphire Sky Lane, St. George, Utah.

The United States may seek a money judgment equal to the value of any property not available for forfeiture as a result of any act or omission of the defendants for one or more of the reasons listed in 21 U.S.C. § 853(p).

The United States may also seek for forfeit substitute assets under 21 U.S.C. § 853(p).

Respectfully submitted,

TRINA A. HIGGINS
United States Attorney

/s/ Travis K. Elder
Travis K. Elder
Assistant U.S. Attorney